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<b>Document Title:</b>	Backup Materials for Item 9, City of Pasadena Water and Power Department, for the May 8th, 2025 CEC Business Meeting
<b>Description:</b>	Memorandum - California Environmental Quality Act (CEQA) Analysis for the City of Pasadena Water and Power Department's Glenarm Battery Energy Storage System Project (DBA-24-006)
<b>Filer:</b>	Marilyn Kung
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
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## **MEMORANDUM**

**TO:** David Hochschild  
Andrew McAllister  
Siva Gunda  
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**FROM:** Renee Webster-Hawkins, Senior Attorney, Chief Counsel's Office

**SUBJECT:** California Environmental Quality Act (CEQA) Analysis for City of Pasadena Water and Power Department's Glenarm Battery Energy Storage System Project (DBA-24-006)

**DATE:** April 23, 2025

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### **Summary**

On the notice for the Business Meeting scheduled for May 8, 2025, the staff of the California Energy Commission (CEC staff) are proposing agreement DBA-24-006 (Agreement) with the City of Pasadena Water and Department (Department) for the Glenarm Battery Energy Storage System Project (Glenarm BESS Project, or Project). The DEBA funding will enable the Department to purchase, install, and report performance of a four-hour lithium-ion battery system with a nameplate capacity of 25 megawatts (MW) of up to 100 megawatt-hours at the Glenarm Power Plant. The Department – commonly known as Pasadena Water and Power (PWP) – is a not-for-profit community owned utility owned and operated by the City of Pasadena (City). The Department proposed the Glenarm BESS Project to the City in response to recommendations in PWP's Integrated Resources Plan (IRP) to accelerate the shift of the City's energy supply portfolio to low-carbon and renewable resources and to increase energy reliability in the event of outages. The Department applied for funding from the California Energy Commission (CEC) in support of the Project under GFO-23-401 and the Distributed Electricity Backup Assets (DEBA) Program. The Department's application was recommended for funding by CEC staff.

This memo discusses the environmental impacts of the proposed Agreement which will partially fund the Glenarm BESS Project. The Project was considered by the City as the lead agency under the California Environmental Quality Act (CEQA) and approved by the local land use agency in Conditional Use Permit #7227 on March 19, 2025. The discretionary decision by the CEC to provide funding for the Project under the proposed Agreement makes the CEC a responsible agency under CEQA. This analysis includes staff's recommendations for the CEC's findings as a responsible agency should the CEC decide to approve the Agreement.

## Record and Documentation related to the Project and Agreement

### CEC Solicitation and City's Application

On December 7, 2023, the CEC released competitive solicitation GFO-23-401 for grant funds for Bulk Grid Assess Enhancements for Grid Reliability for the purchase and installation of 1) efficiency upgrades and 2) capacity additions to existing bulk grid power generators in California that will serve as emergency supply for the state's electrical grid during extreme events. The solicitation proposed a total of \$150 million from DEBA funds for qualifying projects.<sup>1</sup>

On February 20, 2024, the Department submitted an application for \$9,660,000 in funding under GFO-23-401 for the proposed Glenarm BESS Project, specifically to deploy a BESS system, including a 25 MW / 100 MWh capacity Li-ion BESS plus relevant auxiliaries, and associated controls, engineering, and design. In the Application, the Department affirmed that the City of Pasadena would serve as the lead agency under CEQA and that the City was preparing an Initial Study/Mitigated Negative Declaration (IS/MND) to ensure CEQA compliance for the project.

On April 22, 2024, the CEC staff recommended the Department's application for \$9,660,00 in funding, contingent upon the approval of the Agreement at a publicly noticed CEC business meeting and execution of a grant agreement.

### City's CEQA Process and CEC's Review and Comment

On July 29, 2024, the City posted to CEQANet<sup>2</sup> a Notice of Intent to prepare an Initial Study and adopt a Mitigated Negative Declaration (IS/MND), and the project was assigned a state clearinghouse number SCH # 2024080720.<sup>3</sup> The first Draft IS/MND dated July 2024 was initially posted on August 19, 2024, and the 30-day comment period on the first Draft IS/MND ran from August 19, 2024 to September 17, 2024.

In response to the first Draft IS/MND, the Department of Transportation (DOT) and the Department of Toxic Substances Control (DTSC) each publicly posted comment letters on CEQANet.

Additionally, as a responsible agency the CEC staff independently reviewed the Project and the first Draft IS/MND and provided comments directly to the City. The City also shared a pre-release draft of the second Draft IS/MND and invited the CEC staff's review and comment on the updated project description, analysis, and mitigation measures. The CEC's comments on both versions included: suggested edits to the project description; recommendations on the analysis of potential environmental impacts; and specific language for new and amended mitigation measures to reduce potential impacts to a level below significant.

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<sup>1</sup> The entire solicitation and the CEC staff's notice of proposed awards can be accessed at: <https://www.energy.ca.gov/solicitations/2023-12/gfo-23-401-bulk-grid-asset-enhancements-grid-reliability>.

<sup>2</sup> CEQANet is the online searchable database of the State Clearinghouse (SCH) within the California Office of Land Use and Climate Innovation and can be viewed at <https://ceqanet.opr.ca.gov/>.

<sup>3</sup> All documents posted to CEQANet by the City and commenters regarding the Glenarm BESS Project and referenced herein can be viewed at: <https://ceqanet.opr.ca.gov/2024080720>.

The CEC's comments related to battery safety included, but were not limited to, particular emphasis on the description of the battery technology and installation and operational details, the interconnection plans with the existing transmission system, and the safety of the construction and operation of battery energy storage systems to reduce potentially significant environmental impacts from BESS facilities. Recommendations from the CEC for enhanced analysis and mitigation measures related to battery safety included:

- Mitigation measures typically required by the CEC in siting BESS projects
- Requirements consistent with the substantive provisions of Senate Bill 38
- Preparation and approval by the Pasadena Fire Department for an Emergency Response and Emergency Action Plan, which include specified Fire Safety Components, Emergency Response Procedures, and Emergency Evacuation Procedures
- Regular inspections, electrical system evaluation, and battery health assessments
- Construction of the BESS in compliance with the National Fire Protection Association (NFPA) 855 standards for lithium-ion battery systems
- Training for the Pasadena Fire Department and other emergency responders on the potential hazards, methodology for addressing explosion risks and other hazardous conditions
- Requirement that the lithium-ion battery components would be transported to the site on trucks that meet the U.S. Department of Transportation (DOT) safety regulations, including but not limited to Hazardous Materials Regulations and the Lithium Battery Guide for Shippers (Updated October 2024)
- Emphasis on the importance of the soil management plan to avoid hazardous exposure to lead-impacted and contaminated soils
- Updated analysis and mitigated measures to minimize the potential for and response to fire.

The first and second Draft IS/MNDs identified potentially significant impacts from the Project on Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Public Services, and Tribal Cultural Resources, and described mitigation measures to reduce those potential impacts to less than significant levels. In addition to the recommendations listed above to enhance BESS safety, the CEC staff reviewed the analysis and mitigation measures in both versions independently, and recommended additional specific language to:

- Require compliance with the Migratory Bird Treaty Act to protect active bird and raptor nests
- Ensure that decommissioning activities at the end of life of the Glenarm BESS Project avoid significant environmental impacts
- Recommend more technical and in-depth analysis of potential noise levels, and require that the construction and operation of the Project comply with noise levels set by Pasadena Municipal Code Section 9.36
- Clarify the visibility of the Project site from adjacent residential areas and other land uses, and the requirement for a concrete fence surrounding the entire site along the public right of way
- Provide additional information about sensitive receptors including schools at greatest risk for toxic air contaminants
- Enhance the air quality discussion and analysis by summarizing the reduced demand from natural gas units as documented in the Application submitted by the Department, and citing applicable regulations and measures by the California Air Resources Board (CARB) regarding retrofitting, repowering, or replacement of diesel off-road construction equipment, and limiting heavy-duty diesel motor vehicle idling

- Update maps for seismic hazard zones and the site plan
- Recommend updated analysis regarding the Project's impact on population and housing
- Request better substantiation to improve traffic and vehicle trips discussion and analysis
- Recommend clarification to improve utility, water supply, and waste management analysis

On January 3, 2025, the City posted the second Draft IS/MND dated January 2025, and the 30-day comment period on the second Draft IS/MND ran from January 6, 2025 to February 4, 2025. In that second version of the environmental review, the City states "as a Responsible Agency, the CEC has reviewed a draft of the IS/MND and provided input on the overall content, project description, analysis, and associated mitigation." The second Draft IS/MND included all edits, recommendations, and language requested by the CEC staff.

As a responsible agency, the CEC staff independently reviewed the Project and the second Draft IS/MND and provided comments directly to the City. The CEC's recommendations included ensuring that the environmental document describes the letters submitted by the DOT and DTSC, clarification regarding the specifications for the concrete fence surrounding the Property to mitigate visual impacts, and greater visibility about what content was changed between the several drafts to better reflect the City's response to all commenters.

After the public comment period on the second Draft IS/MND expired, the Department posted on its own website the Final Initial Study and Mitigated Negative Declaration (Final IS/MND), its Response to Comments, and a Mitigation Monitoring and Reporting Program (MMRP).<sup>4</sup>

### **City's Public Hearing on the Mitigated Negative Declaration, Mitigation Monitoring and Reporting Program and Conditional Use Permit**

Pursuant to Pasadena Municipal Ordinance section 17.70.050, a Hearing Officer assigned by the Pasadena Planning Director may hold hearings and make decisions on applications for administrative permits, including decisions related to CEQA review of the applications. The ordinances provide the procedures to enable actions taken by the Hearing Officer to be appealed to the Pasadena Board of Zoning Appeals or the City Council.<sup>5</sup>

The City timely posted a Public Notice of a Hearing on the application for Conditional Use Permit #7227 (CUP) to design, construct, and maintain the Glenarm BESS Project. The CUP described the proposal "to establish a Major Utility use (Battery Energy Storage System) at the City of Pasadena's Glenarm Power Plant. The 25-megawatt (MW) Battery Energy Storage System (BESS) would consist of 28 units that would charge and store electricity, with a minimum storage capability of four hours. Design, construction, and maintenance of the BESS Project is required to adhere to all applicable local, state, and federal regulations and protocols."<sup>6</sup>

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<sup>4</sup> These three documents can be accessed at the City's website for planning and environmental notices for the Project at: <https://www.cityofpasadena.net/planning/glenarm-bess-project/>.

<sup>5</sup> The Pasadena Municipal Ordinances are at:

[https://library.municode.com/ca/pasadena/codes/code\\_of\\_ordinances?nodeId=TIT17ZOCO\\_ART7ZO\\_COAD\\_CH17.70ADRE](https://library.municode.com/ca/pasadena/codes/code_of_ordinances?nodeId=TIT17ZOCO_ART7ZO_COAD_CH17.70ADRE).

<sup>6</sup> The Public Notice for the Hearing on CUP #7227 and all documents presented to and considered by the Hearing Officer are posted at: <https://www.cityofpasadena.net/commissions/hearing-officer/past-agendas/> and date-stamped "2025-03-19 Hearing Officer B".

The Public Notice provided that the Hearing Officer would hold a public hearing on March 19, 2025, to consider and potentially adopt the Mitigated Negative Declaration and also to consider and potentially approve the CUP with implementation of mitigation measures from the Final IS/MND.

The Staff Report prepared for the Hearing Officer provided that CUP #7227 is a proposal by the PWP to install a 25-MW utility-scale BESS on an approximately 0.59-acre site, located at 72 East Glenarm Street at PWP's existing Glenarm Power Plant. The Project would charge and store energy, with a minimum storage capability of four hours and would connect to the existing PWP electric transmission system to transfer power, as needed. A private entity would be selected to develop and maintain the BESS and sell the associated capacity and operational attributes to the City under an Energy Storage Agreement (ESA).

The Staff Report summarized the potentially significant impacts identified in the Final IS/MND, and recommended that the Hearing Officer adopt the Final IS/MND and Mitigation Monitoring and Reporting Program (MMRP) in order to implement measures to reduce or avoid significant effects on the environment from the approval of the CUP to allow the Glenarm BESS Project to be constructed and operated. Attachments to the Staff Report included:

- Specific Findings for the Conditional Use Permit #7227
- Conditions of Approval for Conditional Use Permit #7227
- Mitigation Monitoring and Reporting Program (MMRP)
- Mitigated Negative Declaration
- Response to Comments on Draft Initial Study/Mitigated Negative Declaration

On March 19, 2025, the Hearing Officer opened a public hearing on the CUP #7227 and related CEQA environmental documentation.<sup>7</sup> That same day the Hearing Officer adopted the Final IS/MND, the MMRP and CUP #7227.<sup>8</sup> On April 21, 2025, the City posted the approved minutes of the public hearing including the Hearing Officer's decision to adopt the staff's recommendations including the Final IS/MND and CUP #7227.

On March 20, 2025, the City filed a Notice of Determination (NOD) on CEQANet<sup>9</sup>, reporting that as Lead Agency: a Mitigated Negative Declaration was prepared for the project; mitigating measures were made a condition of the approval of the project; and a mitigation reporting or monitoring plan was adopted for the project. No comments or legal claims were filed with the City within the 30-day statute of limitations for the NOD.

### **The CEC's Independent Judgment as a Responsible Agency**

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<sup>7</sup> The audio recording of the hearing can be streamed at <http://www.cityofpasadena.net/commissions/audio-video-recordings/>.

<sup>8</sup> [https://www.cityofpasadena.net/commissions/wp-content/uploads/sites/31/2025-03-19-Hearing-Officer-Minutes\\_1.pdf?v=1745444455064](https://www.cityofpasadena.net/commissions/wp-content/uploads/sites/31/2025-03-19-Hearing-Officer-Minutes_1.pdf?v=1745444455064).

<sup>9</sup> <https://ceqanet.opr.ca.gov/2024080720/3>.

The CEC has noticed an agenda for a Business Meeting on May 8, 2025, and CEC staff has proposed that the CEC approve DEBA Agreement DBA-24-006 with the City of Pasadena Water and Power Department to provide \$9,660,000 to partially fund the City's Glenarm BESS Project. Because the decision to award funding for the construction and operation of this Project is a discretionary decision within the meaning of CEQA, the agenda also proposes CEQA findings for the CEC to adopt as a responsible agency. The findings must reflect the CEC's independent judgment.

The proposed Agreement will allow the grantee, City of Pasadena Water and Power Department, to construct and operate the Glenarm BESS Project.

To prepare the proposed Agreement for the CEC's consideration, the CEC staff has reviewed and considered the entirety of the record for the project. As documented above, this includes independent review of:

- The Application submitted by the Department in response to GFO-23-401,
- The City's CEQA documents relevant to the Glenarm BESS Project including:
  - The Notice of Intent to prepare an Initial Study and Mitigated Negative Declaration (IS/MND),
  - The first IS/MND,
  - The pre-publication draft of the second IS/MND,
  - The second IS/MND,
  - The written comments on these drafts submitted to the City by the Department of Transportation (DOT) and the Department of Toxic Substances Control (DTSC), and individual commenters
  - The Final IS/MND,
  - The City's Response to Comments,
  - The Mitigation Monitoring and Reporting Program (MMRP),
  - The Staff Report submitted to the City's Hearing Officer including Specific Findings for the Conditional Use Permit #7227, Conditions of Approval for Conditional Use Permit #7227, Mitigation Monitoring and Reporting Program (MMRP), the Final IS/MND, and the City's Response to Comments on Draft Initial Study/Mitigated Negative Declaration
- The audio recording of the noticed Public Hearing before the Hearing Officer
- The minutes of the Public Hearing and the Hearing Officer's decision.
  - Agreement.

The CEC staff has been actively engaged with the City staff during the preparation of the CEQA documents listed above. Throughout, the CEC staff has independently considered and analyzed the project, the environmental documentation, and the City staff's preliminary conclusions about the potentially significant impacts of the Glenarm BESS Project on the environment. And throughout, the CEC staff has provided the City staff written and verbal comments, recommendations, and specific edits to the project description, analysis, and mitigation measures. The City staff incorporated all of the CEC staff's input. The Final IS/MND and MMRP fully reflect the independent consideration and analysis of the CEC staff.

All of the construction, operation, and other activities described in the scope of work of the proposed

Agreement fall within the activities evaluated by the City's CEQA documents identified above. The scope of work of the proposed Agreement has no conflicts of information with the City's Final IS/MND and MMRP. Further, the scope of work of the proposed Agreement requires the Department to provide the CEC staff a schedule for all the conditions or mitigation required to obtain or comply with the CUP, including but not limited to plans or testing required by the conditions or mitigation in the MMRP and CUP, and also to provide copies of the plans or testing to the CEC staff upon request.

Based on its independent review, analysis and judgement, the CEC staff offers the following for the CEC's consideration:

### **Aesthetics**

The Final IS/MND found that the Project site is predominantly an empty paved lot enclosed in a well-established industrial facility containing numerous structures that define the visual character of the site, and that public views of the Project site are confined to viewers on nearby roads, schools, and PWP facilities. The Final IS/MND found the Project's impacts on Aesthetics would be less than significant, and the City affirmed in Response to Comments that an 8-foot-tall concrete wall would be constructed along the northern property line to screen views of the proposed Project to those traveling along South Raymond Avenue. The proposed Agreement will not have any impact on aesthetics, and will not change the impacts identified in the City's CEQA documents.

### **Agriculture and Forest Resources**

The Final IS/MND found that there are no forest lands, timberlands, or any Timberland Production zones in the City, nor are there any designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within the Project site or surrounding area. The Final IS/MND found that the Project would have no impact on Agriculture and Forest Resources. The proposed Agreement will not have any impact on agricultural resources, and will not change the impacts identified in the City's CEQA documents.

### **Air Quality**

The Final IS/MND found that the project will comply with all federal, state, and local air quality regulations and permitting, including those under the jurisdiction of the South Coast Air Quality Management District (SCAQMD), and that the Project's emissions are below the SCAQMD Regional Emissions Significance Thresholds for both short-term construction and long-term operational emissions. A project with emissions rates below these thresholds is considered to have a less than significant effect on air quality. The proposed Agreement will not have any impact on air quality, and will not change the impacts identified in the City's CEQA documents.

### **Biological Resources**

The Final IS/MND found that with the implementation of mitigation measures, the Project's impacts to biological resources would be reduced to a less than significant level. Because of the urbanized and industrial nature of the Project area, the presence of candidate, sensitive, or special species is nonexistent, and no wildlife corridors or native wildlife nursery sites are present or adjacent to the Project area. MM BIO-1 will reduce potentially significant impacts to nesting birds protected under



the Migratory Bird Treaty Act to a level of less than significant. With the implementation of these mitigation measures by the City, the proposed Project Agreement will not have any impact on biological resources, and will not change the impacts identified in the City's CEQA documents.

## **Cultural Resources**

The Final IS/MND found that there are four properties located within or immediately adjacent to the project site that are considered historical resources for purposes of CEQA: Glenarm Power Plant, Broadway Power Plant, Pacific Electric Railway Company, Substation No. 2, and Arroyo Seco Parkway. The proposed Glenarm BESS Project does not propose any changes or direct impacts to these resources that would impair major character-defining features; however, the proximity of these resources to the project is considered a potentially significant impact due to the potential risk of fire and explosion associated with BESS facilities. MM HAZ-1 will reduce the potential impacts from risk of fire to a less than significant level. Additionally, MM CUL-1 requires an avoidance and protection plan to prevent physical damage to these resources during demolition and construction of the Project. With the implementation of these mitigation measures by the City, the proposed Agreement will not have any impact on cultural resources, and will not change the impacts identified in the City's CEQA documents.

## **Energy**

The Final IS/MND found the Project's impacts related to energy are less than significant. The Project would have minimal new energy demands, limited to that required to operate various components of the BESS, including the ventilation, thermal management, and security systems. Additionally, the BESS would improve overall energy efficiency by storing excess energy during off-peak hours and releasing it during peak demand periods, thereby reducing the need for additional power generation and associated fuel consumption. The proposed Agreement will not have any impact on energy, and will not change the impacts identified in the City's CEQA documents.

## **Geology and Soils**

The Final IS/MND found that with the implementation of mitigation measures, the Project's potential impacts related to geology and soils would be reduced to less than significant. The Project site is not located within an identified potential fault rupture zone. However, the Project site is located in a seismically active area that would be subject to ground shaking, similar to most of Southern California. The CUP requires PWP submit a soils report to the Building Division for review and approval prior to beginning of construction. The records search did not identify any previously recorded paleontological resources within the Project site. However, there are documented fossil localities near the Project site from the same sedimentary deposits. Therefore, MM GEO-1 requires that a qualified Paleontologist be retained for on-call services in the event of the discovery of paleontologically sensitive rock formations (i.e., bedrock) during ground disturbing activities. With the implementation of this mitigation measure, the proposed Agreement will not have any impact on geology and soils, and will not change the impacts identified in the City's CEQA documents.

## **Greenhouse Gases**

The Final IS/MND found that the Project would result in less than significant impacts related to Greenhouse Gas (GHG) issues. The GHG emissions generated from construction activities will be finite and occur for a relatively shortterm period. Operational GHG emissions for the proposed Project would be minimal since there would not be additional vehicle trips associated with the monitoring and maintenance of the proposed facility. Additionally, the Project itself will result in reductions in GHG emissions relative to the existing conditions by facilitating reduced power production by natural gas-fired units operating in the baseline. The proposed Agreement will not have any impact on greenhouse gases, and will not change the impacts identified in the City's CEQA documents.

### **Hazards and Hazardous Materials**

The Final IS/MND found that with the implementation of mitigation measures, the Project's impacts related to hazards and hazardous materials would be less than significant. CEC staff provided substantial input into the City's draft CEQA documents to reduce the known risks from battery energy storage systems to a level of less than significant. The MMRP and conditions of the CUP require the construction and operation to comply with the substantive requirements of Senate Bill 38 and NAFB 855. To reduce potential impact from risk of fire to a less than significant level, MM HAZ-1 requires an Emergency Response and Emergency Action Plan that addresses installation of fire prevention and detection equipment, procedures for regular inspections of equipment and safety systems, and emergency response procedures. Due to historic power plant and oil company use and underground storage tanks on site, there are areas of the site that are contaminated with petroleum and lead. MM HAZ-2 provides guidance for proper handling and management of petroleum and lead contaminated soil identified at specific areas of the site during construction in conformance with the recommendations in the project's soil management plan. Implementation of Mitigation Measures MM HAZ-1 and MM HAZ-2 would render potential impacts related to the release of hazardous materials into the environment less than significant. The proposed Agreement will not have any impact on hazards and hazardous materials, and will not change the impacts identified in the City's CEQA documents.

### **Hydrology and Water Quality**

The Final IS/MND found that the Project would result in less than significant impacts related to hydrology and water quality. The Project site is currently developed, and there are no natural or channelized drainage features occurring within the Project area. The proposed Agreement will not have any impact on hydrology and water quality, and will not change the impacts identified in the City's CEQA documents.

### **Land Use and Planning**

The Final IS/MND found that the Project would result in no impacts relating to land use and planning. The Project site is located within the SFP-IF HL-56 (South Oaks Specific Plan, Industrial Flex) zoning district, and the General Plan Land Use Designation is R&D Flex Space (0.0-1.25 FAR), which allows for a range of light industrial, utility, and commercial uses for city use. The proposed Agreement will not have any impact on land use and planning, and will not change the impacts identified in the City's CEQA documents.

## **Mineral Resources**

The Final IS/MND found the Project would have no impact on mineral resources. The Project site is located in an urbanized area and has been previously developed. The site is currently a crushed gravel lot with a small concrete pad, indicating that any potential mineral resources would have been made inaccessible by previous development activities. The proposed Agreement will not have any impact on mineral resources, and will not change the impacts identified in the City's CEQA documents.

## **Noise**

The Final IS/MND found the Project would have less than significant impacts on noise. The Project would have temporary increases in ambient noise levels during construction and operation, but would remain within established noise limits. The proposed Agreement will not have any impact on noise, and will not change the impacts identified in the City's CEQA documents.

## **Population and Housing**

The Final IS/MND found the Project 's impacts on population and housing would be less than significant. The Project does not propose any new housing or businesses that would directly induce population growth. Additionally, while the Project would improve energy infrastructure, it is designed to enhance the efficiency and reliability of the existing power system rather than to extend service to new areas that could indirectly induce growth. The proposed Agreement will not have any impact on population and housing, and will not change the impacts identified in the City's CEQA documents.

## **Public Services**

The Final IS/MND found that with the implementation of mitigation measures, the Project would have less than significant impacts relating to public services. CEC staff provided substantial input into the City's draft CEQA documents to reduce the known risks to public services from battery energy storage systems to a level of less than significant. MM PS-1 and MM PS-2 would be implemented to reduce impacts to fire protection services and emergency responders due to the potential risks of fire and release of harmful gases associated with thermal runaway in BESS facilities. No impacts were found for other public services. With the implementation of the mitigation measures, the proposed Agreement will not have any impact on public services, and will not change the impacts identified in the City's CEQA documents.

## **Recreation**

The Final IS/MND found the Project would have no impact on recreation. The Project would be located within an established power plant with no physical effect on nearby park or other recreational opportunities. The proposed Agreement will not have any impact on recreation, and will not change the impacts identified in the City's CEQA documents.

## **Transportation**

The Final IS/MND found that the Project's impacts on transportation would be less than significant. Although the Project would result in limited long-term maintenance related trips, the Project would result in short-term construction-related vehicle and truck trips. The CUP requires all construction activities to be conducted in accordance with adopted transportation standards and the City's modifications to those standards. The proposed Agreement will not have any impact on transportation, and will not change the impacts identified in the City's CEQA documents.

### **Tribal Cultural Resources**

The Final IS/MND found that with Project's impacts on tribal cultural resources would be less than significant with the implementation of mitigation measures. While there are no known prehistoric and/or historic-era archaeological resources within approximately ½-mile of the Project site, and no documented archaeological resources have been recorded on the Project site, MM-TCR-1 and MM-TCR-2 will provide notification to the Gabrieleño Band of Mission Indians – Kizh Nation and specified procedures related to earthwork activities on site. With the implementation of these mitigation measures, the proposed Agreement will not have any impact on tribal cultural resources, and will not change the impacts identified in the City's CEQA documents.

### **Utilities and Service Systems**

The Final IS/MND found that the Project's impacts on utilities and services systems would be less than significant. The proposed Agreement will not have any impact on utilities and service systems, and will not change the impacts identified in the City's CEQA documents.

### **Wildfire**

The Final IS/MND found that there will be no significant impacts associated with wildfire from the Project. The proposed BESS would be designed and constructed in accordance with all applicable fire safety regulations and standards, including NFPA 855. The proposed Agreement will not have any impact on wildfire, and will not change the impacts identified in the City's CEQA document.

### **Conclusion**

In summary, prior to the CEC reaching a decision on the Agreement, the CEC staff provides this memo for the CEC to consider the environmental effects of the Glenarm BESS Project approved by the City in CUP #7227 and proposed for DEBA funding. On the basis of the whole record developed by the City, the CEC staff recommends that the CEC find that with the City's implementation and enforcement of all mitigation measures in the MMRP and conditions of the CUP #7227, there is no substantial evidence that the project will have a significant effect on the environment. The CEC staff further recommends that the CEC find that this conclusion reflects its independent judgment and analysis as a responsible agency under CEQA.